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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92050965
Party	Plaintiff Dallas C. Brown Jr.
Correspondence Address	David H.E. Bursik 401 Hamburg Turnpike, Suite 210 Wayne, NJ 07470 UNITED STATES dheb@bursik.com
Submission	Other Motions/Papers
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Date	03/05/2010
Attachments	TTAB 92050965- Petitioner Pretrial Disclosures.pdf ( 6 pages )(120503 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

_____	:	Cancellation No. 92050965
DALLAS C. BROWN, JR.,	:	Registration No. 2791896
Petitioner,	:	Registration No. 2701247
v.	:	Marks: MAJOR TAYLOR
	:	
COURTNEY L. BISHOP,	:	
Registrant.	:	
_____	:	

**PETITIONER'S PRETRIAL DISCLOSURES**

Comes now Petitioner Dallas C. Brown, Jr. ("The Petitioner") by counsel, and provides his Pretrial Disclosures pursuant to the TTAB May 14, 2009 Scheduling Order and Rule 37 C.F.R. § 2.121(e) to The Registrant:

**I. DISCLOSURE OF INTENDED AND POSSIBLE WITNESSES**

Petitioner

Brown, Brigadier General Dallas C. , Jr.(USA-retired)

17 Devant Drive East, Bluffton, South Carolina 29909

Tel (843) 705-5619

Subjects of Potential Testimony: All matters covered in deposition of Dallas C. Brown, Jr. as set forth in transcript of deposition taken November 6, 2009;

Subjects of Documentary Exhibits referred to by witness: Exhibits marked at deposition of witness Dallas C. Brown, Jr. taken on November 6, 2009 and identified in such deposition;

Bishop, Courtney L.

10377 Alice Court, Fishers, Indiana 46038

Tel

Balf, Todd

Bicycle Books Publishing Co.

Brown, Jan B.

Brown, Joyce Bush

Brown, Leonard G.

Calloway, Alpharetta

Calloway, Clark

Calloway, Wayne

Cook, Frances

Cook, Robert

Daily, Marti

DeHainaut, Robin

Dusay, Catherine

Donovan, Karen Brown

Dusay, Catherine

Evans, Fred

Fink, Linda  
c/o Major Taylor Velodrome  
3649 Cold Spring Road, Indianapolis, Indiana 46222

Gordis, Kent

Indiana University representative

Kostman, Chris

Kyles, Theodore E., Jr., Esq.  
685 Van Houten Avenue  
Clifton, New Jersey 07013

Loving, Paul

Macadoo, Garland

Montgomery, Scott

Nasdor, Robert

Nau, Christina

Naylor, Valerie Bush

Nike USA representatives

Nock, Elaine

Nye, Peter

Ogden, Dale

Quigley, Joe

Ritchie, Andrew

Root, Greg

Seward, Brad

Tolman, Lynne  
270 Sunderland Road, #59, Worcester, MA 01604

Vails, Nelson

Velodrome Attorney  
c/o Major Taylor Velodrome  
3649 Cold Spring Road, Indianapolis, Indiana 46222

Washington, Enrique

## **II. DISCLOSURE OF INTENDED AND POSSIBLE DOCUMENTARY EXHIBITS**

Exhibits identified and marked as exhibits at deposition of Dallas C. Brown, Jr. taken on November 6, 2009 as referenced in transcript of such deposition

Exhibits identified and marked as exhibits at deposition of Enrique Washington taken on November 5, 2009 as referenced in transcript of such deposition

Exhibits identified and marked as exhibits at deposition of Courtney Bishop. taken on January 19 and 20, 2010 as referenced in transcript of such deposition

Exhibits attached to Affidavit of Dallas C. Brown, Jr. filed with the United States District Court for the Southern District of Indiana, Indianapolis Division on or about March 3, 2010

Exhibits attached to Affidavit of Karen B. Donovan filed with the United States District Court for the Southern District of Indiana, Indianapolis Division on or about March 3, 2010

Adventure Cycling Association obituary reference to  
Sydney Taylor Brown

Annual Report and Budget Proposal  
I.M.O. Major Taylor 1991-1992  
Indiana University Little 500

Answers of Courtney Bishop to Donovan TTAB Interrogatories

Assignment of rights to Karen Brown Donovan

Biographical page about Major Taylor produced by  
Courtney Bishop in TTAB litigation

Birth certificate of Major Taylor

Birth certificate of Sydney Taylor Brown

Books referencing life and/or accomplishments of Major Taylor  
including:  
"Major Taylor-The Extraordinary Career  
Of a Champion Bicycle Racer" by Andrew Ritchie

Contribution Form for Major Taylor Foundation

Correspondence including:  
June 8, 2007 letter from Gadson to Kyles;  
To Whom It May Concern from I.M.O. Major Taylor  
Letter to Pearlizumi from I.M.O. Major Taylor  
Letter to "Dear Friends" from Courtney Bishop  
Letter from Nike to Courtney Bishop  
Memorandum from Nike Sports Marketing to Bishop 5/11/05  
Email Bishop to Nike 12/11/07

Cycling Team Contract between Nike and Team Major Taylor

Death Certificate of Daisy Taylor

Death Certificate of Major Taylor

Death Certificate of Sydney Taylor Brown

Documentation Produced by Courtney Bishop in connection  
TTAB

Email May 29, 2000 from Bishop to Root

Family tree of Major Taylor

Filings on behalf of Courtney Bishop in US PTO, TTAB and USDC

Filings on behalf of Karen Brown Donovan in PTO, TTAB and USDC

Goods labeled with Major Taylor trademark by or for Courtney Bishop

I.M.O. Major Taylor labels

Indiana Museum Collection components including donations from Major Taylor family including scrapbook

Letters received by Sydney Taylor Brown about Major Taylor

License Agreement between Karen Brown Donovan and Nike

Little 500 2005

Magazine articles re: Major Taylor  
Including:  
Bike Culture Magazine May 2007

Major Taylor Civic Associations web pages

Marriage Certificate for Major Taylor and Daisy Taylor

NBC Interview DVD

Newspaper articles and clippings re: Major Taylor  
July 2, 1932 Chicago Defender; May 29, 1948;  
Dayton Daily News February 18, 2007  
Telegram & Gazette April 6, 16 and July 26, 2004  
Telegram & Gazette April 19 and November 2, 2005  
Telegram & Gazette November 13, 2007 and July 2, 24, 26/ 2006  
Boston Globe December 23, 2007 and July 24, 2006

Nike Timeline from Bishop

Obituary of Daisy Taylor

Obituary of Major Taylor

Obituary of Sydney Taylor Brown

Official Partnership Proposal with Cannondale and  
Check in payment from Cannondale

Passport of Major Taylor

Photographs of Major Taylor family and descendants

Postcard from Major Taylor Foundation

Power of attorney held by Karen Brown Donovan

Response of Courtney Bishop to Karen Donovan Document TTAB  
Demand

Retro Image Apparel documentation

Sponsorship Agreement with Trek Bicycle Corporation

Statue unveiling photos, audio, video and program

Trademark Search ordered and obtained by Courtney Bishop

Transcript of Courtney L. Bishop deposition and exhibits  
Marked in such deposition

University of Pittsburgh collections donations from Major Taylor  
family including scrapbook

Web pages from web sites for organizations and associations  
in which Courtney Bishop was involved  
including Velodrome, Major Taylor Association,

Who is Major Taylor by Wilton D. Alston

Date: March 5, 2010

Respectfully submitted,

*David H.E. Bursik*

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